

National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



October 21, 2011

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Ball Aerospace & Technologies Corporation's NPP Launch Reception on October 26, 2011

On October 26, 2011, Ball Aerospace and Technologies Corporation, will host a launch reception at the Santa Ynez Valley Marriott, Buellton, California from 5:00 PM-6:30 PM. The purpose of this event is to celebrate the NPP launch and provide an opportunity for launch attendees to network.

Attending the reception will be NASA personnel, NOAA, NSF, USAF, Members of Congress and their staffs, including industry representatives from Ball Aerospace, Raytheon, ITT and Northrop Grumman. Approximately 500-600 people have been invited and are expected to attend. The estimated cost of the reception, which includes all food and beverages, is \$30.00 per person with a cash bar. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the reception will allow NASA representatives the opportunity to build relationships and improve lines of communications with other guests and to discuss NASA's programs and plans. Accordingly, NASA employees whose duties do not substantially affect the event sponsor, or a majority or all of its members, may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

However, NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of the reception for themselves and accompanying guests. Moreover, NASA employees whose duties do not substantially affect the event sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(1) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone